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SOUTHERN DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

UNITED STATES OF AMERICA, Plaintiff, v. MICHAEL BESS-AMARILLAS (1), ERIK MEDELLIN-LOPEZ (2), ALFREDO GARCIA-ORTEGA (3), Defendants.	Criminal Case No. 08 CR 0307 JM I N D I C T M E N T Title 8, U.S.C., Sec. 1324(a)(2)(B)(ii) - Bringing in Illegal Aliens for Financial Gain; Title 8, U.S.C., Secs. 1324(a)(1)(A)(ii) and (v)(II) - Transportation of Illegal Aliens and Aiding and Abetting; Title 8, U.S.C., Sec. 1324(a)(1)(A)(i) - Bringing in Illegal Aliens; Title 18, U.S.C., Sec. 2 - Aiding and Abetting

The grand jury charges:

Count 1

On or about January 26, 2008, within the Southern District of California, defendants ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jesus Tovar-Venegas, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 2

On or about January 26, 2008, within the Southern District of California, defendants ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jesus Tovar-Venegas, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 3

On or about January 26, 2008, within the Southern District of California, defendants ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, did bring or attempt to bring to the United States an alien, namely, Jesus Tovar-Venegas, knowing that said person was an alien, at a place other than a designated port of entry and at a place other than as designated by the Department of Homeland Security; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i), and Title 18, United States Code, Section 2.

Count 4

On or about January 26, 2008, within the Southern District of California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Vanessa Mavel Martinez, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 5

On or about January 26, 2008, within the Southern District of California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Vanessa Mavel Martinez, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 6

On or about January 26, 2008, within the Southern District of California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, did bring or attempt to bring to the United States an alien, namely, Vanessa Mavel Martinez, knowing that said person was an alien, at a place other than a designated port of entry and at a place other than as designated by the Department of Homeland Security; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i), and Title 18, United States Code, Section 2.

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Count 7

On or about January 26, 2008, within the Southern District of California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Oscar Armando Gonzalez-Lorenzana, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 8

On or about January 26, 2008, within the Southern District of California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Oscar Armando Gonzalez-Lorenzana, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 9

On or about January 26, 2008, within the Southern District of California, defendants MICHAEL BESS-AMARILLAS, ERIK MEDELLIN-LOPEZ and ALFREDO GARCIA-ORTEGA, with the intent to violate the immigration laws of the United States, did bring or attempt to bring to the United States an alien, namely, Oscar Armando Gonzalez-Lorenzana, knowing that said person was an alien, at a place other than a designated port of entry and at a place other than as designated by the Department of Homeland Security; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i), and Title 18, United States Code, Section 2.

DATED: February 6, 2008.

A TRUE BILL:

Foreperson

KAREN P. HEWITT
United States Attorney

By:
PAUL L. STARITA
Assistant U.S. Attorney